

7-4-2003 - 6 PM Local Time - Terminal Number 1

RE: RM-10740 for small occupy band with on Amateur Radio.

1. I'm for this proposal, however there short falls in thinking that this proopsed RM [Rule Making] has failed to address.

(A). First of all it will not address all the past manufactured equipment that was manufactured under other radio services that was [CONVERTED] to Amateur Radio Service with mutch wider emissions then were later reduced by the commission later! The old emission of 8A3, 6A3, and even the less popular early wide audio versions witch could only be called 10A3 or 12A3 [Not Acutal Authorized Emissions] but were allowed to exist in early AM radio station broadcasting equipment from the early 1930's.

Because a lot of ham gear from the late 1930's was classified as 8A3, then in the 1970 commerical and business equipment was classified as 6A3 in HF [Up to 50 Mhz] that was converted to Amateur [Ham] use this type of equipment should be collective "Granfathered" based on a date of original equipment manufactured!

This request is a basic good idea to reduce the QRM that is so bad today! The de-facto type remarks used in this request are very true!

The personal attacks on Mr. Hollingworth [In the form of back door] questioning & praise to bring this to the attention of the masses of ham's is at best a "Civil Protest" of un-usual un-clear government policy with regauards to the real un-known standards for "Good Ham Technical Prattice" in operating our ham station! PERPLEXED  
AT WHAT I'M TRYING TO SAY ? ? ?

The use of "Good Amateur Prattice" is in what one persons point of view see's and thinks! Ham radio is not a LEVEL playing field it a pointe of view what good for the general ham radio community has changed over and over again through the years.

I'm more our less not shocked that some manufacture, or ham has not addressed this term "Good Amateur Prattice" issue in a federal court, before a real Judge, not a appointed ALJ by the commission!

What Mr. Hollingsworth wants today, may change tommrow when his job term is up, when the commission shifts jobs around at the WTB, or by his future replacment some +years down the line. For a General point of view he's did a good job, and he will continue to do a good job also, But to allow the terms the wording "Good Amateur Prattice" This is only issue of allowing the Attorney's for the Commission to play a flip-flop with basic policy.

Most new equipment manufactured is engineered to meet government standards all over the world. I suggest that a "Fixed Date" in the future be established as a start point for the New bandwidth standards on new TYPE APPROVED or TYPE ACCEPTEED ham gear. This will allow the manufacturs the need-ed time to make gradual changes need-ed in production.

Allow equipment manufactured before a date set by the commission to

be "Grandfathered" as major changes make it less in any VALUE!

(B). The remarks about a low cost audio filter at the mike input are true you can make a "cut off" but in most cases, but its level and effect will wide-ly vary from radio to radio.

Professional / Commerical / Old Military radios used a series of audio stages with both sharp and rounded off audio cut off's to make the best of the audio. Motorola perhaps the best known for its audio filtering at several stages along various path's in a commerical radio is only a common example of good audio from old equipment. Other manufactures of good quality trasmitters included E F Johnson, and the list go's on....!

The average Ham today pushes his PEP audio to the point of it becoming a SQ Wave, and most have little true Lab Equipment to monitor, or look at the actual wave form of band with! In most case they ask the receiving station, "How's it Sound" and you hear this hundred of time each night on the HF bands.

Going back to Random Station Inspections by the FCC would help to resolve this a small bit, but it would not be cost effective for the FCC to do this on a large scale!

If your asking someone on the other COAST" who has a 12 Kc wide receiver in collection [Operating SSB] how your sounding its wrong! Mr. Hollingsworth need's to address the wide band stations who out to make a issue of breaking true [de-facto] technical standards that would show this fellows a "Pig" on there true bandwith. From all indications Mr. Hollingsworth has did his job on this issue well!

However on the side of the "Wide Banders" who want to use 160 m AM its a mater of ethics, and good will on frequency sharing!

(C). The FCC needs to establish a "Cut off Date" for all past wide band equipment of manufacture! Just as in the case of the FCC allowing some limited digital voice modes sutch as APCO project 25 emissions they should allow the ultra wide band AM'ers, and hi-fi wide SSB operators some place to do the need-ed play time, research, and operation.

Because "Gentelman Ham's" won't be "Gentelman" its time for some simple regulation by the commission!

(D). This idea that it takes all night of "Tweeking" the audio levels, and assorted trasmitter equipment changes to make it sound on to one station, then to have some one else request a change of the same station is wasited time on a very populated HF segments today. If anyone monitors the 26 Mhz to 28 Mhz you hear the same mike audio comments there also! A amateur stations was never act as a "Broadcast Station" [Commerical Type] but all night putting over the air comments about someones "Manufactured" audio system that they can go out and purchass at a Ham Store is Broadcasting!

We have enough "info commerical" on TV stations today, do we need them on Ham Radio [Amateur] all night!

The ARRL, CQ, and lots of other mag's will publish the suggested audio band pass & cut off systems if this proposal go's through!

I suspect the actual mike audio will be converted to digital with the need-ed factors inside the chip then back to limited form of audio. Some Mfg will offer mics that will do a good job.

But limiting the input audio in a cheep way will not help if the fellow wants tweek wrong stages in his HF station. Roll Off and Cut off's in later stages of a digital nature can only did in future new equipment for "Voice Limited" Quality. The only way to stop the true offenders [Some with almost Class B] emissions is station inspections, inquires as to what equipment is in use!

(F). If a Amateur station is using a "old" type emission he should be required to keep in his "amateur own's" file a proof of when he purchased, put in service, repaired, changed values, of Original Mfg Equipment as a mater of station record.

It's a know fact that some Ham's are using "Old" AM braodcast stations with as mutch as 50,000 Watts on the ham bands. They all state that the radio output is well under the current band limits for RF power. This type of equipment has been used on FEMA type drill's at 5,000 Watts and 10,000 Watts by hams who wish to brag on Federal Frequencys! This type of operation too common! This type of Ham needs inspection by both FEMA and the FCC at times on a random basis. To make sure that it needs new emission standards.

Apply new proposed standard to New MFG ham radio equipment set a future date. Allow present to be grandfathered, Inspect stations, and make required FCC inquires as to what equipment a station with wide audio using, and if not in reasonable technical operations enforcment action.

(G). Very small band segments for wide band audio in a future rule making.

Please forgive Spell Check is not working at this terminal, but I think you can decode the text! Thanks

Dale E. Reich  
141 North Center St.  
Seville, Ohio 44273 - 9504

telephone (330) 769-3071 + long walk to phone no "OOO" or "PPP"  
blocked call accepted machine requires +11 rings for machine.

ak437@mail.acorn.net

exab8fq@hotmail.com

